

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA,
ex rel. ALEX DOE, Relator,

THE STATE OF TEXAS,
ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA,
ex rel. ALEX DOE, Relator,

Plaintiffs,

v.

PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC.,
PLANNED PARENTHOOD GULF
COAST, INC., PLANNED
PARENTHOOD OF GREATER
TEXAS, INC., PLANNED
PARENTHOOD SOUTH
TEXAS, INC., PLANNED
PARENTHOOD CAMERON
COUNTY, INC., PLANNED
PARENTHOOD SAN ANTONIO,
INC.,

Defendants.

Civil Action No. 2:21-CV-00022-Z

**DECLARATION OF HEATHER HACKER IN SUPPORT OF RELATOR'S
OPPOSITION TO PPFA'S EMERGENCY MOTION FOR PROTECTIVE
ORDER, EXPEDITED BRIEFING, AND STAY OF DEADLINE TO MOVE TO
PRESERVE CONFIDENTIALITY**

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury as follows:

1. I am over the age of eighteen and am competent to make this declaration.

2. Using the e-discovery platform Relativity, I retrieved the numbers of documents in each of PPFA's productions as well as the numbers of documents designated Attorney Eyes Only and Confidential. That data is reflected in the chart attached to this declaration as Exhibit 1.

3. PPFA has de-designated or reduced the designations of some documents since they were originally produced. To the best of my knowledge, these numbers reflect the *current* designations of the produced documents. Thus, when originally produced, there were even more documents designated as AEO/Confidential.

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct. Executed on September 29, 2022.

/s/Heather Hacker
Heather Hacker

Exhibit 1

PPFA Production	Date	Total Docs	AEO	Confidential	Percentage AEO/Confidential	Percentage AEO
PPFA001	8/1/22	26	0	0	0%	0%
PPFA002	8/4/22	325	47	123	52%	14%
PPFA003	8/8/22	228	111	86	61%	77%
PPFA004	8/22/22	21	21	0	100%	100%
PPFA005	8/30/22	62	9	25	55%	15%
PPFA006	9/2/22	2,321	677	1,567	97%	29%
PPFA007	9/9/22	12,972	10,294	1,988	95%	79%
PPFA008	9/9/22	42560	36,133	5,974	99%	85%
PPFA009	9/9/22	19,233	8,780	1,091	51%	46%
PPFA010	9/9/22	8	0	8	100%	0%
PPFA011	9/9/22	72	0	72	100%	0%
PPFA012	9/16/22	36	36	0	100%	100%
PPFA013	9/16/22	12	0	7	58%	0%
PPFA014	9/23/22	0	0	0	0	0%
PPFA015	9/23/22	2	0	1	50%	50%
TOTAL:		77,878	56,108	10,942	86%	72%